

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT HUNTINGTON**

JUSTIN ADKINS, et al.,

Plaintiffs,

v.

Civil Action No. 3:18-CV-00321

CSX CORPORATION, et al.,

Defendants.

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**CSX CORPORATION'S ANSWER TO SECOND AMENDED COMPLAINT**

NOW COMES the Defendant, CSX Corporation for its Answer to Plaintiffs' Second Amended Complaint and states as follows:

**FIRST DEFENSE**

The Second Amended Complaint filed herein fails to state a claim against Defendant, CSX Corporation, upon which relief can be granted.

**SECOND DEFENSE**

The Second Amended Complaint, in Paragraph 10, defines CSX Corporation and CSX Transportation, Inc. together as "CSX". This is factually inaccurate and any attempt to define CSX Corporation and CSX Transportation, Inc. as one entity is denied. In the allegations throughout the Second Amended Complaint Plaintiffs complain of acts or make reference to "CSX/CSXT" or "CSX and/or CSXT". CSX Corporation did not employee any of the Plaintiffs or Defendants in this matter, CSX Corporation did not take any action or make any recommendations in this matter. CSX Corporation is a holding company and is not a rail carrier

engaged in interstate commerce. To the extent that the Plaintiffs' Second Amended Complaint makes statements about or makes allegations concerning CSX Corporation, those allegations are denied.

### **THIRD DEFENSE**

The Court lacks personal jurisdiction over this Defendant, CSX Corporation.

### **FOURTH DEFENSE**

### **JURISDICTION AND VENUE**

1. Answering Paragraph 1 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and Defendant CSX Corporation cannot admit or deny the allegations contained therein.

2. Answering Paragraph 2 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and Defendant CSX Corporation cannot admit or deny the allegations contained therein.

### **PARTIES**

3. Answering Paragraph 3 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

4. Answering Paragraph 4 of the Second Amended Complaint, Defendant CSX Corporation admits the allegations contained therein as it referenced CSX Transportation, Inc., however to the extent that the allegations include CSX Corporation, the allegations are specifically denied.

5. Answering Paragraph 5 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations regarding CSX Corporation contained therein.

6. Answering Paragraph 6 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

7. Answering Paragraph 7 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

8. Answering Paragraph 8 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

9. Answering Paragraph 9 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

10. Answering Paragraph 10 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

11. Answering Paragraph 11 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and Defendant CSX Corporation cannot admit or deny the allegations contained therein.

**SUMMARY OF ACTION**

**Justin Adkins-Electrician**

12. Answering Paragraph 12 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

13. Answering Paragraph 13 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

14. Answering Paragraph 14 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

15. Answering Paragraph 15 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

16. Answering Paragraph 16 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

17. Answering Paragraph 17 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

18. Answering Paragraph 18 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

19. Answering Paragraph 19 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

20. Answering Paragraph 20 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

21. Answering Paragraph 21 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

22. Answering Paragraph 22 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

23. Answering Paragraph 23 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

24. Answering Paragraph 24 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

25. Answering Paragraph 25 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 25 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

26. Answering Paragraph 26 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

27. Answering Paragraph 27 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

28. Answering Paragraph 28 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

29. Answering Paragraph 29 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

30. Answering Paragraph 30 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

31. Answering Paragraph 31 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

32. Answering Paragraph 32 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

33. Answering Paragraph 33 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

34. Answering Paragraph 34 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

35. Answering Paragraph 35 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

36. Answering Paragraph 36 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

37. Answering Paragraph 37 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

38. Answering Paragraph 38 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

39. Answering Paragraph 39 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

40. Answering Paragraph 40 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

41. Answering Paragraph 41 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

42. Answering Paragraph 42 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

43. Answering Paragraph 43 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

44. Answering Paragraph 44 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

45. Answering Paragraph 45 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



46. Answering Paragraph 46 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

47. Answering Paragraph 47 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

48. Answering Paragraph 48 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Justin Blake-Electrician**

49. Answering Paragraph 49 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

50. Answering Paragraph 50 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

51. Answering Paragraph 51 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

52. Answering Paragraph 52 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

53. Answering Paragraph 53 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

54. Answering Paragraph 54 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

55. Answering Paragraph 55 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

56. Answering Paragraph 56 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof

57. Answering Paragraph 57 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

58. Answering Paragraph 58 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

59. Answering Paragraph 59 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

60. Answering Paragraph 60 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to

which no response is required. Otherwise, the allegations of Paragraph 60 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

61. Answering Paragraph 61 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

62. Answering Paragraph 62 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

63. Answering Paragraph 63 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

64. Answering Paragraph 64 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

65. Answering Paragraph 65 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

66. Answering Paragraph 66 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

67. Answering Paragraph 67 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

68. Answering Paragraph 68 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

69. Answering Paragraph 69 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

70. Answering Paragraph 70 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

71. Answering Paragraph 71 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

72. Answering Paragraph 72 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

73. Answering Paragraph 73 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

74. Answering Paragraph 74 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

75. Answering Paragraph 75 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

76. Answering Paragraph 76 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

77. Answering Paragraph 77 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

78. Answering Paragraph 78 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

79. Answering Paragraph 79 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

80. Answering Paragraph 80 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

81. Answering Paragraph 81 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

82. Answering Paragraph 82 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Edwin Glowacki-Electrician**

83. Answering Paragraph 83 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

84. Answering Paragraph 84 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

85. Answering Paragraph 85 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

86. Answering Paragraph 86 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

87. Answering Paragraph 87 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

88. Answering Paragraph 88 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

89. Answering Paragraph 89 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

90. Answering Paragraph 90 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

91. Answering Paragraph 91 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

92. Answering Paragraph 92 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

93. Answering Paragraph 93 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

94. Answering Paragraph 94 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

95. Answering Paragraph 95 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

96. Answering Paragraph 96 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 96 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

97. Answering Paragraph 97 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

98. Answering Paragraph 98 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

99. Answering Paragraph 99 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

100. Answering Paragraph 100 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

101. Answering Paragraph 101 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



102. Answering Paragraph 102 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

103. Answering Paragraph 103 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

104. Answering Paragraph 104 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

105. Answering Paragraph 105 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

106. Answering Paragraph 106 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

107. Answering Paragraph 107 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

108. Answering Paragraph 108 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

109. Answering Paragraph 109 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

110. Answering Paragraph 110 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

111. Answering Paragraph 111 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

112. Answering Paragraph 112 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

113. Answering Paragraph 113 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

114. Answering Paragraph 114 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

115. Answering Paragraph 115 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

116. Answering Paragraph 116 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

117. Answering Paragraph 117 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

118. Answering Paragraph 118 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Eric Jordan-Electrician**

119. Answering Paragraph 119 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

120. Answering Paragraph 120 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

121. Answering Paragraph 121 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

122. Answering Paragraph 122 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

123. Answering Paragraph 123 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

124. Answering Paragraph 124 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

125. Answering Paragraph 125 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

126. Answering Paragraph 126 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

127. Answering Paragraph 127 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

128. Answering Paragraph 128 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

129. Answering Paragraph 129 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

130. Answering Paragraph 130 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to

which no response is required. Otherwise, the allegations of Paragraph 130 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

131. Answering Paragraph 131 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

132. Answering Paragraph 132 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

133. Answering Paragraph 133 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

134. Answering Paragraph 134 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

135. Answering Paragraph 135 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

136. Answering Paragraph 136 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

137. Answering Paragraph 137 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

138. Answering Paragraph 138 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

139. Answering Paragraph 139 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

140. Answering Paragraph 140 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

141. Answering Paragraph 141 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

142. Answering Paragraph 142 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

143. Answering Paragraph 143 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

144. Answering Paragraph 144 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

145. Answering Paragraph 145 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

146. Answering Paragraph 146 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

147. Answering Paragraph 147 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

148. Answering Paragraph 148 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

149. Answering Paragraph 149 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

150. Answering Paragraph 150 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

151. Answering Paragraph 151 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

152. Answering Paragraph 152 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

153. Answering Paragraph 153 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Kevin Palmer-Electrician**

154. Answering Paragraph 154 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

155. Answering Paragraph 155 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

156. Answering Paragraph 156 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

157. Answering Paragraph 157 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



158. Answering Paragraph 158 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

159. Answering Paragraph 159 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

160. Answering Paragraph 160 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

161. Answering Paragraph 161 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

162. Answering Paragraph 162 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

163. Answering Paragraph 163 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

164. Answering Paragraph 164 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

165. Answering Paragraph 165 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

166. Answering Paragraph 166 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

167. Answering Paragraph 167 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 167 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

168. Answering Paragraph 168 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

169. Answering Paragraph 169 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

170. Answering Paragraph 170 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

171. Answering Paragraph 171 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

172. Answering Paragraph 172 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

173. Answering Paragraph 173 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

174. Answering Paragraph 174 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

175. Answering Paragraph 175 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

176. Answering Paragraph 176 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

177. Answering Paragraph 177 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

178. Answering Paragraph 178 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

179. Answering Paragraph 179 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

180. Answering Paragraph 180 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

181. Answering Paragraph 181 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

182. Answering Paragraph 182 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

183. Answering Paragraph 183 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

184. Answering Paragraph 184 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

185. Answering Paragraph 185 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

186. Answering Paragraph 186 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

187. Answering Paragraph 187 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

188. Answering Paragraph 188 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

189. Answering Paragraph 189 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

190. Answering Paragraph 190 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Samuel Preston-Electrician**

191. Answering Paragraph 191 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

192. Answering Paragraph 192 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

193. Answering Paragraph 193 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

194. Answering Paragraph 194 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

195. Answering Paragraph 195 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

196. Answering Paragraph 196 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

197. Answering Paragraph 197 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

198. Answering Paragraph 198 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

199. Answering Paragraph 199 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

200. Answering Paragraph 200 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

201. Answering Paragraph 201 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

202. Answering Paragraph 202 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 202 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

203. Answering Paragraph 203 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

204. Answering Paragraph 204 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

205. Answering Paragraph 205 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

206. Answering Paragraph 206 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

207. Answering Paragraph 207 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

208. Answering Paragraph 208 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

209. Answering Paragraph 209 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

210. Answering Paragraph 210 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

211. Answering Paragraph 211 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

212. Answering Paragraph 212 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

213. Answering Paragraph 213 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



214. Answering Paragraph 214 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

215. Answering Paragraph 215 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

216. Answering Paragraph 216 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

217. Answering Paragraph 217 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

218. Answering Paragraph 218 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

219. Answering Paragraph 219 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

220. Answering Paragraph 220 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

221. Answering Paragraph 221 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

222. Answering Paragraph 222 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

223. Answering Paragraph 223 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

224. Answering Paragraph 224 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

225. Answering Paragraph 225 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Dennis Sargent-Electrician**

226. Answering Paragraph 226 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

227. Answering Paragraph 227 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

228. Answering Paragraph 228 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

229. Answering Paragraph 229 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

230. Answering Paragraph 230 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

231. Answering Paragraph 231 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

232. Answering Paragraph 232 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

233. Answering Paragraph 233 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

234. Answering Paragraph 234 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

235. Answering Paragraph 235 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

236. Answering Paragraph 236 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

237. Answering Paragraph 237 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

238. Answering Paragraph 238 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 238 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

239. Answering Paragraph 239 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

240. Answering Paragraph 240 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

241. Answering Paragraph 241 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

242. Answering Paragraph 242 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

243. Answering Paragraph 243 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

244. Answering Paragraph 244 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

245. Answering Paragraph 245 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

246. Answering Paragraph 246 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

247. Answering Paragraph 247 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

248. Answering Paragraph 248 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

249. Answering Paragraph 249 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

250. Answering Paragraph 250 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

251. Answering Paragraph 251 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

252. Answering Paragraph 252 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

253. Answering Paragraph 253 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

254. Answering Paragraph 254 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

255. Answering Paragraph 255 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

256. Answering Paragraph 256 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

257. Answering Paragraph 257 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

258. Answering Paragraph 258 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

259. Answering Paragraph 259 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

260. Answering Paragraph 260 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Travis Thornsberry-Electrician**

261. Answering Paragraph 261 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

262. Answering Paragraph 262 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

263. Answering Paragraph 263 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

264. Answering Paragraph 264 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

265. Answering Paragraph 265 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

266. Answering Paragraph 266 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

267. Answering Paragraph 267 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

268. Answering Paragraph 268 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

269. Answering Paragraph 269 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



270. Answering Paragraph 270 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

271. Answering Paragraph 271 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

272. Answering Paragraph 272 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

273. Answering Paragraph 273 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 273 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

274. Answering Paragraph 274 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

275. Answering Paragraph 275 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

276. Answering Paragraph 276 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

277. Answering Paragraph 277 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

278. Answering Paragraph 278 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

279. Answering Paragraph 279 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

280. Answering Paragraph 280 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

281. Answering Paragraph 281 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

282. Answering Paragraph 282 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

283. Answering Paragraph 283 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

284. Answering Paragraph 284 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

285. Answering Paragraph 285 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

286. Answering Paragraph 286 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

287. Answering Paragraph 287 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

288. Answering Paragraph 288 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

289. Answering Paragraph 289 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

290. Answering Paragraph 290 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

291. Answering Paragraph 291 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

292. Answering Paragraph 292 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

293. Answering Paragraph 293 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

294. Answering Paragraph 294 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

295. Answering Paragraph 295 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

296. Answering Paragraph 296 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Michael Williams-Electrician**

297. Answering Paragraph 297 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

298. Answering Paragraph 298 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

299. Answering Paragraph 299 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

300. Answering Paragraph 300 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

301. Answering Paragraph 301 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

302. Answering Paragraph 302 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

303. Answering Paragraph 303 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

304. Answering Paragraph 304 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

305. Answering Paragraph 305 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

306. Answering Paragraph 306 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

307. Answering Paragraph 307 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

308. Answering Paragraph 308 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 308 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

309. Answering Paragraph 309 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

310. Answering Paragraph 310 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

311. Answering Paragraph 311 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

312. Answering Paragraph 312 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

313. Answering Paragraph 313 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

314. Answering Paragraph 314 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

315. Answering Paragraph 315 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

316. Answering Paragraph 316 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

317. Answering Paragraph 317 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

318. Answering Paragraph 318 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

319. Answering Paragraph 319 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

320. Answering Paragraph 320 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

321. Answering Paragraph 321 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

322. Answering Paragraph 322 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

323. Answering Paragraph 323 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

324. Answering Paragraph 324 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

325. Answering Paragraph 325 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



326. Answering Paragraph 326 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

327. Answering Paragraph 327 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

328. Answering Paragraph 328 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

329. Answering Paragraph 329 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

330. Answering Paragraph 330 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

331. Answering Paragraph 331 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**John Baker-Boilermaker**

332. Answering Paragraph 332 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

333. Answering Paragraph 333 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

334. Answering Paragraph 334 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

335. Answering Paragraph 335 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

336. Answering Paragraph 336 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

337. Answering Paragraph 337 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

338. Answering Paragraph 338 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

339. Answering Paragraph 339 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

340. Answering Paragraph 340 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

341. Answering Paragraph 341 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

342. Answering Paragraph 342 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 342 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

343. Answering Paragraph 343 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

344. Answering Paragraph 344 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

345. Answering Paragraph 345 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

346. Answering Paragraph 346 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

347. Answering Paragraph 347 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

348. Answering Paragraph 348 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

349. Answering Paragraph 349 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

350. Answering Paragraph 350 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

351. Answering Paragraph 351 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

352. Answering Paragraph 352 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

353. Answering Paragraph 353 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

354. Answering Paragraph 354 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

355. Answering Paragraph 355 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

356. Answering Paragraph 356 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

357. Answering Paragraph 357 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

358. Answering Paragraph 358 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

359. Answering Paragraph 359 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

360. Answering Paragraph 360 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

361. Answering Paragraph 361 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

362. Answering Paragraph 362 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

363. Answering Paragraph 363 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

364. Answering Paragraph 364 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**James Blain-Boilermaker**

365. Answering Paragraph 365 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

366. Answering Paragraph 366 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

367. Answering Paragraph 367 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

368. Answering Paragraph 368 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

369. Answering Paragraph 369 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

370. Answering Paragraph 370 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

371. Answering Paragraph 371 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

372. Answering Paragraph 372 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

373. Answering Paragraph 373 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

374. Answering Paragraph 374 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

375. Answering Paragraph 375 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 375 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

376. Answering Paragraph 376 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

377. Answering Paragraph 377 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

378. Answering Paragraph 378 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

379. Answering Paragraph 379 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

380. Answering Paragraph 380 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



381. Answering Paragraph 381 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

382. Answering Paragraph 382 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

383. Answering Paragraph 383 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

384. Answering Paragraph 384 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

385. Answering Paragraph 385 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

386. Answering Paragraph 386 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

387. Answering Paragraph 387 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

388. Answering Paragraph 388 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

389. Answering Paragraph 389 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

390. Answering Paragraph 390 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

391. Answering Paragraph 391 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

392. Answering Paragraph 392 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

393. Answering Paragraph 393 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

394. Answering Paragraph 394 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

395. Answering Paragraph 395 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

396. Answering Paragraph 396 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

397. Answering Paragraph 397 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

398. Answering Paragraph 398 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Devery Brown-Boilermaker**

399. Answering Paragraph 399 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

400. Answering Paragraph 400 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

401. Answering Paragraph 401 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

402. Answering Paragraph 402 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

403. Answering Paragraph 403 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

404. Answering Paragraph 404 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

405. Answering Paragraph 405 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

406. Answering Paragraph 406 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

407. Answering Paragraph 407 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

408. Answering Paragraph 408 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

409. Answering Paragraph 409 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to

which no response is required. Otherwise, the allegations of Paragraph 409 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

410. Answering Paragraph 410 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

411. Answering Paragraph 411 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

412. Answering Paragraph 412 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

413. Answering Paragraph 413 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

414. Answering Paragraph 414 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

415. Answering Paragraph 415 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

416. Answering Paragraph 416 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

417. Answering Paragraph 417 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

418. Answering Paragraph 418 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

419. Answering Paragraph 419 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

420. Answering Paragraph 420 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

421. Answering Paragraph 421 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

422. Answering Paragraph 422 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

423. Answering Paragraph 423 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

424. Answering Paragraph 424 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

425. Answering Paragraph 425 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

426. Answering Paragraph 426 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

427. Answering Paragraph 427 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

428. Answering Paragraph 428 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

429. Answering Paragraph 429 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

430. Answering Paragraph 430 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

431. Answering Paragraph 431 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**James Deal-Boilermaker**

432. Answering Paragraph 432 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

433. Answering Paragraph 433 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

434. Answering Paragraph 434 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

435. Answering Paragraph 435 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

436. Answering Paragraph 436 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



437. Answering Paragraph 437 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

438. Answering Paragraph 438 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

439. Answering Paragraph 439 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

440. Answering Paragraph 440 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

441. Answering Paragraph 441 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

442. Answering Paragraph 442 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 442 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

443. Answering Paragraph 443 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

444. Answering Paragraph 444 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

445. Answering Paragraph 445 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

446. Answering Paragraph 446 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

447. Answering Paragraph 447 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

448. Answering Paragraph 448 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

449. Answering Paragraph 449 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

450. Answering Paragraph 450 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

451. Answering Paragraph 451 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

452. Answering Paragraph 452 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

453. Answering Paragraph 453 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

454. Answering Paragraph 454 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

455. Answering Paragraph 455 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

456. Answering Paragraph 456 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

457. Answering Paragraph 457 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

458. Answering Paragraph 458 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

459. Answering Paragraph 459 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

460. Answering Paragraph 460 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

461. Answering Paragraph 461 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

462. Answering Paragraph 462 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

463. Answering Paragraph 463 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

464. Answering Paragraph 464 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

465. Answering Paragraph 465 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Jonathan Jeffers-Boilermaker**

466. Answering Paragraph 466 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

467. Answering Paragraph 467 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

468. Answering Paragraph 468 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

469. Answering Paragraph 469 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

470. Answering Paragraph 470 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

471. Answering Paragraph 471 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

472. Answering Paragraph 472 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

473. Answering Paragraph 473 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

474. Answering Paragraph 474 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

475. Answering Paragraph 475 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

476. Answering Paragraph 476 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 476 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

477. Answering Paragraph 477 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

478. Answering Paragraph 478 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

479. Answering Paragraph 479 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

480. Answering Paragraph 480 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

481. Answering Paragraph 481 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

482. Answering Paragraph 482 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

483. Answering Paragraph 483 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

484. Answering Paragraph 484 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

485. Answering Paragraph 485 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

486. Answering Paragraph 486 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

487. Answering Paragraph 487 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

488. Answering Paragraph 488 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

489. Answering Paragraph 489 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

490. Answering Paragraph 490 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

491. Answering Paragraph 491 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

492. Answering Paragraph 492 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



493. Answering Paragraph 493 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

494. Answering Paragraph 494 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

495. Answering Paragraph 495 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

496. Answering Paragraph 496 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

497. Answering Paragraph 497 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

498. Answering Paragraph 498 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

499. Answering Paragraph 499 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Robert Mosteller-Boilermaker**

500. Answering Paragraph 500 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

501. Answering Paragraph 501 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

502. Answering Paragraph 502 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

503. Answering Paragraph 503 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

504. Answering Paragraph 504 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

505. Answering Paragraph 505 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

506. Answering Paragraph 506 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

507. Answering Paragraph 507 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

508. Answering Paragraph 508 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

509. Answering Paragraph 509 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

510. Answering Paragraph 510 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

511. Answering Paragraph 511 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

512. Answering Paragraph 512 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 512 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

513. Answering Paragraph 513 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

514. Answering Paragraph 514 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

515. Answering Paragraph 515 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

516. Answering Paragraph 516 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

517. Answering Paragraph 517 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

518. Answering Paragraph 518 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

519. Answering Paragraph 519 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

520. Answering Paragraph 520 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

521. Answering Paragraph 521 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

522. Answering Paragraph 522 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

523. Answering Paragraph 523 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

524. Answering Paragraph 524 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

525. Answering Paragraph 525 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

526. Answering Paragraph 526 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

527. Answering Paragraph 527 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

528. Answering Paragraph 528 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

529. Answering Paragraph 529 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

530. Answering Paragraph 530 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

531. Answering Paragraph 531 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

532. Answering Paragraph 532 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Michael L. Potter-Boilermaker**

533. Answering Paragraph 533 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

534. Answering Paragraph 534 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

535. Answering Paragraph 535 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

536. Answering Paragraph 536 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

537. Answering Paragraph 537 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

538. Answering Paragraph 538 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

539. Answering Paragraph 539 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

540. Answering Paragraph 540 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

541. Answering Paragraph 541 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

542. Answering Paragraph 542 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

543. Answering Paragraph 543 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 543 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

544. Answering Paragraph 544 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

545. Answering Paragraph 545 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

546. Answering Paragraph 546 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

547. Answering Paragraph 547 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

548. Answering Paragraph 548 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



549. Answering Paragraph 549 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

550. Answering Paragraph 550 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

551. Answering Paragraph 551 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

552. Answering Paragraph 552 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

553. Answering Paragraph 553 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

554. Answering Paragraph 554 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

555. Answering Paragraph 555 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

556. Answering Paragraph 556 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

557. Answering Paragraph 557 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

558. Answering Paragraph 558 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

559. Answering Paragraph 559 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

560. Answering Paragraph 560 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

561. Answering Paragraph 561 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

562. Answering Paragraph 562 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

563. Answering Paragraph 563 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

564. Answering Paragraph 564 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

565. Answering Paragraph 565 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Michael D. Potter-Boilermaker**

566. Answering Paragraph 566 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

567. Answering Paragraph 567 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

568. Answering Paragraph 568 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

569. Answering Paragraph 569 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

570. Answering Paragraph 570 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

571. Answering Paragraph 571 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

572. Answering Paragraph 572 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

573. Answering Paragraph 573 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

574. Answering Paragraph 574 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

575. Answering Paragraph 575 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

576. Answering Paragraph 576 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 576 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

577. Answering Paragraph 577 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

578. Answering Paragraph 578 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

579. Answering Paragraph 579 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

580. Answering Paragraph 580 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

581. Answering Paragraph 581 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

582. Answering Paragraph 582 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

583. Answering Paragraph 583 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

584. Answering Paragraph 584 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

585. Answering Paragraph 585 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

586. Answering Paragraph 586 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

587. Answering Paragraph 587 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

588. Answering Paragraph 588 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

589. Answering Paragraph 589 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

590. Answering Paragraph 590 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

591. Answering Paragraph 591 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

592. Answering Paragraph 592 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

593. Answering Paragraph 593 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

594. Answering Paragraph 594 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

595. Answering Paragraph 595 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

596. Answering Paragraph 596 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

597. Answering Paragraph 597 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

598. Answering Paragraph 598 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

599. Answering Paragraph 599 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Jesse Wallace-Boilermaker**

600. Answering Paragraph 600 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

601. Answering Paragraph 601 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

602. Answering Paragraph 602 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

603. Answering Paragraph 603 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

604. Answering Paragraph 604 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



605. Answering Paragraph 605 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

606. Answering Paragraph 606 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

607. Answering Paragraph 607 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

608. Answering Paragraph 608 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

609. Answering Paragraph 609 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

610. Answering Paragraph 610 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 610 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

611. Answering Paragraph 611 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

612. Answering Paragraph 612 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

613. Answering Paragraph 613 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

614. Answering Paragraph 614 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

615. Answering Paragraph 615 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

616. Answering Paragraph 616 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

617. Answering Paragraph 617 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

618. Answering Paragraph 618 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

619. Answering Paragraph 619 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

620. Answering Paragraph 620 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

621. Answering Paragraph 621 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

622. Answering Paragraph 622 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

623. Answering Paragraph 623 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

624. Answering Paragraph 624 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

625. Answering Paragraph 625 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

626. Answering Paragraph 626 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

627. Answering Paragraph 627 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

628. Answering Paragraph 628 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

629. Answering Paragraph 629 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

630. Answering Paragraph 630 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

631. Answering Paragraph 631 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

632. Answering Paragraph 632 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

633. Answering Paragraph 633 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Timothy Witt-Boilermaker**

634. Answering Paragraph 634 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

635. Answering Paragraph 635 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

636. Answering Paragraph 636 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

637. Answering Paragraph 637 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

638. Answering Paragraph 638 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

639. Answering Paragraph 639 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

640. Answering Paragraph 640 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

641. Answering Paragraph 641 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

642. Answering Paragraph 642 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

643. Answering Paragraph 643 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

644. Answering Paragraph 644 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 644 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

645. Answering Paragraph 645 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

646. Answering Paragraph 646 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

647. Answering Paragraph 647 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

648. Answering Paragraph 648 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

649. Answering Paragraph 649 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

650. Answering Paragraph 650 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

651. Answering Paragraph 651 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

652. Answering Paragraph 652 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

653. Answering Paragraph 653 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

654. Answering Paragraph 654 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

655. Answering Paragraph 655 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

656. Answering Paragraph 656 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

657. Answering Paragraph 657 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

658. Answering Paragraph 658 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

659. Answering Paragraph 659 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

660. Answering Paragraph 660 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



661. Answering Paragraph 661 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

662. Answering Paragraph 662 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

663. Answering Paragraph 663 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

664. Answering Paragraph 664 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

665. Answering Paragraph 665 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

666. Answering Paragraph 666 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Bobby Akers-Carman**

667. Answering Paragraph 667 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

668. Answering Paragraph 668 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

669. Answering Paragraph 669 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

670. Answering Paragraph 670 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

671. Answering Paragraph 671 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

672. Answering Paragraph 672 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

673. Answering Paragraph 673 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

674. Answering Paragraph 674 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

675. Answering Paragraph 675 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

676. Answering Paragraph 676 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

677. Answering Paragraph 677 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 677 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

678. Answering Paragraph 678 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

679. Answering Paragraph 679 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

680. Answering Paragraph 680 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

681. Answering Paragraph 681 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

682. Answering Paragraph 682 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

683. Answering Paragraph 683 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

684. Answering Paragraph 684 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

685. Answering Paragraph 685 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

686. Answering Paragraph 686 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

687. Answering Paragraph 687 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

688. Answering Paragraph 688 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

689. Answering Paragraph 689 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

690. Answering Paragraph 690 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

691. Answering Paragraph 691 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

692. Answering Paragraph 692 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

693. Answering Paragraph 693 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

694. Answering Paragraph 694 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

695. Answering Paragraph 695 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

696. Answering Paragraph 696 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

697. Answering Paragraph 697 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

698. Answering Paragraph 698 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

699. Answering Paragraph 699 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

700. Answering Paragraph 700 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Gerald Barber - Carman**

701. Answering Paragraph 701 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

702. Answering Paragraph 702 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

703. Answering Paragraph 703 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

704. Answering Paragraph 704 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

705. Answering Paragraph 705 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

706. Answering Paragraph 706 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

707. Answering Paragraph 707 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

708. Answering Paragraph 708 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

709. Answering Paragraph 709 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

710. Answering Paragraph 710 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

711. Answering Paragraph 711 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 711 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

712. Answering Paragraph 712 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

713. Answering Paragraph 713 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

714. Answering Paragraph 714 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

715. Answering Paragraph 715 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

716. Answering Paragraph 716 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



717. Answering Paragraph 717 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

718. Answering Paragraph 718 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

719. Answering Paragraph 719 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

720. Answering Paragraph 720 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

721. Answering Paragraph 721 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

722. Answering Paragraph 722 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

723. Answering Paragraph 723 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

724. Answering Paragraph 724 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

725. Answering Paragraph 725 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

726. Answering Paragraph 726 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

727. Answering Paragraph 727 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

728. Answering Paragraph 728 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

729. Answering Paragraph 729 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

730. Answering Paragraph 730 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

731. Answering Paragraph 731 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

732. Answering Paragraph 732 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

733. Answering Paragraph 733 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

734. Answering Paragraph 734 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**John Bills - Carman**

735. Answering Paragraph 735 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

736. Answering Paragraph 736 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

737. Answering Paragraph 737 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

738. Answering Paragraph 738 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

739. Answering Paragraph 739 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

740. Answering Paragraph 740 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

741. Answering Paragraph 741 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

742. Answering Paragraph 742 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

743. Answering Paragraph 743 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

744. Answering Paragraph 744 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

745. Answering Paragraph 745 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to

which no response is required. Otherwise, the allegations of Paragraph 745 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

746. Answering Paragraph 746 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

747. Answering Paragraph 747 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

748. Answering Paragraph 748 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

749. Answering Paragraph 749 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

750. Answering Paragraph 750 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

751. Answering Paragraph 751 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

752. Answering Paragraph 752 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

753. Answering Paragraph 753 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

754. Answering Paragraph 754 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

755. Answering Paragraph 755 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

756. Answering Paragraph 756 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

757. Answering Paragraph 757 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

758. Answering Paragraph 758 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

759. Answering Paragraph 759 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

760. Answering Paragraph 760 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

761. Answering Paragraph 761 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

762. Answering Paragraph 762 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

763. Answering Paragraph 763 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

764. Answering Paragraph 764 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

765. Answering Paragraph 765 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

766. Answering Paragraph 766 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

767. Answering Paragraph 767 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

768. Answering Paragraph 768 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Michael Clark – Carman**

769. Answering Paragraph 769 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

770. Answering Paragraph 770 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

771. Answering Paragraph 771 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

772. Answering Paragraph 772 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



773. Answering Paragraph 773 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

774. Answering Paragraph 774 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

775. Answering Paragraph 775 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

776. Answering Paragraph 776 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

777. Answering Paragraph 777 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

778. Answering Paragraph 778 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

779. Answering Paragraph 779 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 779 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

780. Answering Paragraph 780 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

781. Answering Paragraph 781 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

782. Answering Paragraph 782 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

783. Answering Paragraph 783 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

784. Answering Paragraph 784 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

785. Answering Paragraph 785 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

786. Answering Paragraph 786 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

787. Answering Paragraph 787 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

788. Answering Paragraph 788 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

789. Answering Paragraph 789 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

790. Answering Paragraph 790 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

791. Answering Paragraph 791 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

792. Answering Paragraph 792 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

793. Answering Paragraph 793 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

794. Answering Paragraph 794 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

795. Answering Paragraph 795 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

796. Answering Paragraph 796 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

797. Answering Paragraph 797 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

798. Answering Paragraph 798 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

799. Answering Paragraph 799 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

800. Answering Paragraph 800 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

801. Answering Paragraph 801 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

802. Answering Paragraph 802 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Randall Craycraft - Carman**

803. Answering Paragraph 803 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

804. Answering Paragraph 804 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

805. Answering Paragraph 805 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

806. Answering Paragraph 806 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

807. Answering Paragraph 807 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

808. Answering Paragraph 808 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

809. Answering Paragraph 809 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

810. Answering Paragraph 810 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

811. Answering Paragraph 811 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

812. Answering Paragraph 812 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

813. Answering Paragraph 813 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 813 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

814. Answering Paragraph 814 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

815. Answering Paragraph 815 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

816. Answering Paragraph 816 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

817. Answering Paragraph 817 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

818. Answering Paragraph 818 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

819. Answering Paragraph 819 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

820. Answering Paragraph 820 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

821. Answering Paragraph 821 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

822. Answering Paragraph 822 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

823. Answering Paragraph 823 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

824. Answering Paragraph 824 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

825. Answering Paragraph 825 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

826. Answering Paragraph 826 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

827. Answering Paragraph 827 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

828. Answering Paragraph 828 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



829. Answering Paragraph 829 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

830. Answering Paragraph 830 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

831. Answering Paragraph 831 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

832. Answering Paragraph 832 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

833. Answering Paragraph 833 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

834. Answering Paragraph 834 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

835. Answering Paragraph 835 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

836. Answering Paragraph 836 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**John Frasure - Carman**

837. Answering Paragraph 837 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

838. Answering Paragraph 838 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

839. Answering Paragraph 839 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

840. Answering Paragraph 840 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

841. Answering Paragraph 841 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

842. Answering Paragraph 842 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

843. Answering Paragraph 843 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

844. Answering Paragraph 844 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

845. Answering Paragraph 845 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

846. Answering Paragraph 846 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

847. Answering Paragraph 847 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

848. Answering Paragraph 848 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

849. Answering Paragraph 849 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 849 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

850. Answering Paragraph 850 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

851. Answering Paragraph 851 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

852. Answering Paragraph 852 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

853. Answering Paragraph 853 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

854. Answering Paragraph 854 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

855. Answering Paragraph 855 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

856. Answering Paragraph 856 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

857. Answering Paragraph 857 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

858. Answering Paragraph 858 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

859. Answering Paragraph 859 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

860. Answering Paragraph 860 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

861. Answering Paragraph 861 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

862. Answering Paragraph 862 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

863. Answering Paragraph 863 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

864. Answering Paragraph 864 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

865. Answering Paragraph 865 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

866. Answering Paragraph 866 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

867. Answering Paragraph 867 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

868. Answering Paragraph 868 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

869. Answering Paragraph 869 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

870. Answering Paragraph 870 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Joshua Hall- Carman**

871. Answering Paragraph 871 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

872. Answering Paragraph 872 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

873. Answering Paragraph 873 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

874. Answering Paragraph 874 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

875. Answering Paragraph 875 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

876. Answering Paragraph 876 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

877. Answering Paragraph 877 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

878. Answering Paragraph 878 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

879. Answering Paragraph 879 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

880. Answering Paragraph 880 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

881. Answering Paragraph 881 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 881 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

882. Answering Paragraph 882 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

883. Answering Paragraph 883 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

884. Answering Paragraph 884 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



885. Answering Paragraph 885 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

886. Answering Paragraph 886 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

887. Answering Paragraph 887 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

888. Answering Paragraph 888 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

889. Answering Paragraph 889 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

890. Answering Paragraph 890 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

891. Answering Paragraph 891 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

892. Answering Paragraph 892 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

893. Answering Paragraph 893 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

894. Answering Paragraph 894 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

895. Answering Paragraph 895 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

896. Answering Paragraph 896 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

897. Answering Paragraph 897 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

898. Answering Paragraph 898 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

899. Answering Paragraph 899 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

900. Answering Paragraph 900 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

901. Answering Paragraph 901 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

902. Answering Paragraph 902 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Sammy Maddix - Carman**

903. Answering Paragraph 903 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

904. Answering Paragraph 904 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

905. Answering Paragraph 905 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

906. Answering Paragraph 906 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

907. Answering Paragraph 907 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

908. Answering Paragraph 908 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

909. Answering Paragraph 909 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

910. Answering Paragraph 910 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

911. Answering Paragraph 911 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

912. Answering Paragraph 912 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

913. Answering Paragraph 913 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

914. Answering Paragraph 914 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 914 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

915. Answering Paragraph 915 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

916. Answering Paragraph 916 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

917. Answering Paragraph 917 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

918. Answering Paragraph 918 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

919. Answering Paragraph 919 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

920. Answering Paragraph 920 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

921. Answering Paragraph 921 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

922. Answering Paragraph 922 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

923. Answering Paragraph 923 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

924. Answering Paragraph 924 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

925. Answering Paragraph 925 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

926. Answering Paragraph 926 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

927. Answering Paragraph 927 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

928. Answering Paragraph 928 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

929. Answering Paragraph 929 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

930. Answering Paragraph 930 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

931. Answering Paragraph 931 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

932. Answering Paragraph 932 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

933. Answering Paragraph 933 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

934. Answering Paragraph 934 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Zack Potter- Carman**

935. Answering Paragraph 935 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

936. Answering Paragraph 936 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

937. Answering Paragraph 937 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

938. Answering Paragraph 938 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

939. Answering Paragraph 939 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

940. Answering Paragraph 940 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



941. Answering Paragraph 941 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

942. Answering Paragraph 942 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

943. Answering Paragraph 943 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

944. Answering Paragraph 944 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

945. Answering Paragraph 945 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

946. Answering Paragraph 946 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 946 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

947. Answering Paragraph 947 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

948. Answering Paragraph 948 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

949. Answering Paragraph 949 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

950. Answering Paragraph 950 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

951. Answering Paragraph 951 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

952. Answering Paragraph 952 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

953. Answering Paragraph 953 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

954. Answering Paragraph 954 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

955. Answering Paragraph 955 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

956. Answering Paragraph 956 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

957. Answering Paragraph 957 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

958. Answering Paragraph 958 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

959. Answering Paragraph 959 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

960. Answering Paragraph 960 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

961. Answering Paragraph 961 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

962. Answering Paragraph 962 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

963. Answering Paragraph 963 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

964. Answering Paragraph 964 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

965. Answering Paragraph 965 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

966. Answering Paragraph 966 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

967. Answering Paragraph 967 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

968. Answering Paragraph 968 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

969. Answering Paragraph 969 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**James Stinnett- Carman**

970. Answering Paragraph 970 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

971. Answering Paragraph 971 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

972. Answering Paragraph 972 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

973. Answering Paragraph 973 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

974. Answering Paragraph 974 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

975. Answering Paragraph 975 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

976. Answering Paragraph 976 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

977. Answering Paragraph 977 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

978. Answering Paragraph 978 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

979. Answering Paragraph 979 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

980. Answering Paragraph 980 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

981. Answering Paragraph 981 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 981 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

982. Answering Paragraph 982 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

983. Answering Paragraph 983 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

984. Answering Paragraph 984 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

985. Answering Paragraph 985 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

986. Answering Paragraph 986 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

987. Answering Paragraph 987 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

988. Answering Paragraph 988 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

989. Answering Paragraph 989 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

990. Answering Paragraph 990 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

991. Answering Paragraph 991 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

992. Answering Paragraph 992 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

993. Answering Paragraph 993 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

994. Answering Paragraph 994 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

995. Answering Paragraph 995 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

996. Answering Paragraph 996 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



997. Answering Paragraph 997 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

998. Answering Paragraph 998 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

999. Answering Paragraph 999 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1000. Answering Paragraph 1000 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1001. Answering Paragraph 1001 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1002. Answering Paragraph 1002 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1003. Answering Paragraph 1003 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1004. Answering Paragraph 1004 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Todd Thayer- Carman**

1005. Answering Paragraph 1005 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1006. Answering Paragraph 1006 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1007. Answering Paragraph 1007 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1008. Answering Paragraph 1008 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1009. Answering Paragraph 1009 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1010. Answering Paragraph 1010 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1011. Answering Paragraph 1011 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1012. Answering Paragraph 1012 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1013. Answering Paragraph 1013 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1014. Answering Paragraph 1014 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1015. Answering Paragraph 1015 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1016. Answering Paragraph 1016 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1016 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1017. Answering Paragraph 1017 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1018. Answering Paragraph 1018 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1019. Answering Paragraph 1019 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1020. Answering Paragraph 1020 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1021. Answering Paragraph 1021 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1022. Answering Paragraph 1022 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1023. Answering Paragraph 1023 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1024. Answering Paragraph 1024 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1025. Answering Paragraph 1025 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1026. Answering Paragraph 1026 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1027. Answering Paragraph 1027 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1028. Answering Paragraph 1028 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1029. Answering Paragraph 1029 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1030. Answering Paragraph 1030 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1031. Answering Paragraph 1031 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1032. Answering Paragraph 1032 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1033. Answering Paragraph 1033 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1034. Answering Paragraph 1034 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1035. Answering Paragraph 1035 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1036. Answering Paragraph 1036 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1037. Answering Paragraph 1037 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1038. Answering Paragraph 1038 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1039. Answering Paragraph 1039 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Deanna Lanham- Clerk**

1040. Answering Paragraph 1040 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1041. Answering Paragraph 1041 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1042. Answering Paragraph 1042 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1043. Answering Paragraph 1043 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1044. Answering Paragraph 1044 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1045. Answering Paragraph 1045 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1046. Answering Paragraph 1046 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1047. Answering Paragraph 1047 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1048. Answering Paragraph 1048 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1049. Answering Paragraph 1049 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1050. Answering Paragraph 1050 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1050 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1051. Answering Paragraph 1051 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1052. Answering Paragraph 1052 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1053. Answering Paragraph 1053 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1054. Answering Paragraph 1054 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1055. Answering Paragraph 1055 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1056. Answering Paragraph 1056 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1057. Answering Paragraph 1057 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1058. Answering Paragraph 1058 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1059. Answering Paragraph 1059 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1060. Answering Paragraph 1060 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1061. Answering Paragraph 1061 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1062. Answering Paragraph 1062 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1063. Answering Paragraph 1063 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1064. Answering Paragraph 1064 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1065. Answering Paragraph 1065 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1066. Answering Paragraph 1066 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1067. Answering Paragraph 1067 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1068. Answering Paragraph 1068 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1069. Answering Paragraph 1069 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1070. Answering Paragraph 1070 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1071. Answering Paragraph 1071 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1072. Answering Paragraph 1072 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1073. Answering Paragraph 1073 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Michael Campbell – communications maintainer**

1074. Answering Paragraph 1074 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1075. Answering Paragraph 1075 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1076. Answering Paragraph 1076 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1077. Answering Paragraph 1077 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1078. Answering Paragraph 1078 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1079. Answering Paragraph 1079 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1080. Answering Paragraph 1080 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1081. Answering Paragraph 1081 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1082. Answering Paragraph 1082 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1083. Answering Paragraph 1083 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1084. Answering Paragraph 1084 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1085. Answering Paragraph 1085 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1085 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1086. Answering Paragraph 1086 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1087. Answering Paragraph 1087 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1088. Answering Paragraph 1088 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1089. Answering Paragraph 1089 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1090. Answering Paragraph 1090 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1091. Answering Paragraph 1091 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1092. Answering Paragraph 1092 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1093. Answering Paragraph 1093 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1094. Answering Paragraph 1094 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1095. Answering Paragraph 1095 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1096. Answering Paragraph 1096 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1097. Answering Paragraph 1097 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1098. Answering Paragraph 1098 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1099. Answering Paragraph 1099 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1100. Answering Paragraph 1100 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1101. Answering Paragraph 1101 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1102. Answering Paragraph 1102 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1103. Answering Paragraph 1103 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1104. Answering Paragraph 1104 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1105. Answering Paragraph 1105 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1106. Answering Paragraph 1106 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1107. Answering Paragraph 1107 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1108. Answering Paragraph 1108 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



**Tony Abdon - Conductor**

1109. Answering Paragraph 1109 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1110. Answering Paragraph 1110 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1111. Answering Paragraph 1111 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1112. Answering Paragraph 1112 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1113. Answering Paragraph 1113 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1114. Answering Paragraph 1114 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1115. Answering Paragraph 1115 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1116. Answering Paragraph 1116 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1117. Answering Paragraph 1117 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1118. Answering Paragraph 1118 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1119. Answering Paragraph 1119 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1119 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1120. Answering Paragraph 1120 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1121. Answering Paragraph 1121 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1122. Answering Paragraph 1122 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1123. Answering Paragraph 1123 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1124. Answering Paragraph 1124 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1125. Answering Paragraph 1125 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1126. Answering Paragraph 1126 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1127. Answering Paragraph 1127 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1128. Answering Paragraph 1128 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1129. Answering Paragraph 1129 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1130. Answering Paragraph 1130 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1131. Answering Paragraph 1131 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1132. Answering Paragraph 1132 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1133. Answering Paragraph 1133 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1134. Answering Paragraph 1134 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1135. Answering Paragraph 1135 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1136. Answering Paragraph 1136 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1137. Answering Paragraph 1137 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1138. Answering Paragraph 1138 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1139. Answering Paragraph 1139 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1140. Answering Paragraph 1140 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1141. Answering Paragraph 1141 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Chad Little - Engineer**

1142. Answering Paragraph 1142 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1143. Answering Paragraph 1143 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1144. Answering Paragraph 1144 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1145. Answering Paragraph 1145 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1146. Answering Paragraph 1146 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1147. Answering Paragraph 1147 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1148. Answering Paragraph 1148 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1149. Answering Paragraph 1149 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1150. Answering Paragraph 1150 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1151. Answering Paragraph 1151 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1152. Answering Paragraph 1152 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1153. Answering Paragraph 1153 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1154. Answering Paragraph 1154 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1155. Answering Paragraph 1155 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1156. Answering Paragraph 1156 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1157. Answering Paragraph 1157 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1157 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1158. Answering Paragraph 1158 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1159. Answering Paragraph 1159 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1160. Answering Paragraph 1160 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1161. Answering Paragraph 1161 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1162. Answering Paragraph 1162 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1163. Answering Paragraph 1163 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1164. Answering Paragraph 1164 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1165. Answering Paragraph 1165 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1166. Answering Paragraph 1166 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1167. Answering Paragraph 1167 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1168. Answering Paragraph 1168 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1169. Answering Paragraph 1169 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1170. Answering Paragraph 1170 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1171. Answering Paragraph 1171 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1172. Answering Paragraph 1172 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1173. Answering Paragraph 1173 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1174. Answering Paragraph 1174 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1175. Answering Paragraph 1175 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1176. Answering Paragraph 1176 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1177. Answering Paragraph 1177 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Brandon Adkins – Fireman / Oiler**

1178. Answering Paragraph 1178 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1179. Answering Paragraph 1179 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1180. Answering Paragraph 1180 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1181. Answering Paragraph 1181 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1182. Answering Paragraph 1182 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1183. Answering Paragraph 1183 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1184. Answering Paragraph 1184 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1185. Answering Paragraph 1185 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1186. Answering Paragraph 1186 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1187. Answering Paragraph 1187 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1188. Answering Paragraph 1188 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1189. Answering Paragraph 1189 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1189 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1190. Answering Paragraph 1190 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1191. Answering Paragraph 1191 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1192. Answering Paragraph 1192 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1193. Answering Paragraph 1193 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1194. Answering Paragraph 1194 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1195. Answering Paragraph 1195 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1196. Answering Paragraph 1196 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1197. Answering Paragraph 1197 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1198. Answering Paragraph 1198 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1199. Answering Paragraph 1199 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1200. Answering Paragraph 1200 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1201. Answering Paragraph 1201 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1202. Answering Paragraph 1202 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1203. Answering Paragraph 1203 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1204. Answering Paragraph 1204 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1205. Answering Paragraph 1205 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1206. Answering Paragraph 1206 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1207. Answering Paragraph 1207 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1208. Answering Paragraph 1208 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1209. Answering Paragraph 1209 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1210. Answering Paragraph 1210 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1211. Answering Paragraph 1211 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Jacqueline Marshall - Fireman/Oiler**

1212. Answering Paragraph 1212 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1213. Answering Paragraph 1213 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1214. Answering Paragraph 1214 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1215. Answering Paragraph 1215 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1216. Answering Paragraph 1216 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1217. Answering Paragraph 1217 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1218. Answering Paragraph 1218 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1219. Answering Paragraph 1219 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1220. Answering Paragraph 1220 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1221. Answering Paragraph 1221 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1222. Answering Paragraph 1222 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1222 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1223. Answering Paragraph 1223 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1224. Answering Paragraph 1224 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1225. Answering Paragraph 1225 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1226. Answering Paragraph 1226 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1227. Answering Paragraph 1227 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1228. Answering Paragraph 1228 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1229. Answering Paragraph 1229 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1230. Answering Paragraph 1230 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1231. Answering Paragraph 1231 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1232. Answering Paragraph 1232 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1233. Answering Paragraph 1233 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1234. Answering Paragraph 1234 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1235. Answering Paragraph 1235 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1236. Answering Paragraph 1236 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1237. Answering Paragraph 1237 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1238. Answering Paragraph 1238 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1239. Answering Paragraph 1239 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1240. Answering Paragraph 1240 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1241. Answering Paragraph 1241 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1242. Answering Paragraph 1242 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1243. Answering Paragraph 1243 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1244. Answering Paragraph 1244 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Homer Maynard – Fireman/Oiler**

1245. Answering Paragraph 1245 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1246. Answering Paragraph 1246 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1247. Answering Paragraph 1247 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1248. Answering Paragraph 1248 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1249. Answering Paragraph 1249 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1250. Answering Paragraph 1250 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1251. Answering Paragraph 1251 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1252. Answering Paragraph 1252 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1253. Answering Paragraph 1253 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1254. Answering Paragraph 1254 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1255. Answering Paragraph 1255 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1255 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1256. Answering Paragraph 1256 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1257. Answering Paragraph 1257 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1258. Answering Paragraph 1258 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1259. Answering Paragraph 1259 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1260. Answering Paragraph 1260 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1261. Answering Paragraph 1261 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1262. Answering Paragraph 1262 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1263. Answering Paragraph 1263 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1264. Answering Paragraph 1264 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1265. Answering Paragraph 1265 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1266. Answering Paragraph 1266 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1267. Answering Paragraph 1267 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1268. Answering Paragraph 1268 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1269. Answering Paragraph 1269 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1270. Answering Paragraph 1270 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1271. Answering Paragraph 1271 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1272. Answering Paragraph 1272 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1273. Answering Paragraph 1273 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1274. Answering Paragraph 1274 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1275. Answering Paragraph 1275 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1276. Answering Paragraph 1276 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1277. Answering Paragraph 1277 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Jeremy Napier – Fireman/Oiler**

1278. Answering Paragraph 1278 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1279. Answering Paragraph 1279 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1280. Answering Paragraph 1280 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1281. Answering Paragraph 1281 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1282. Answering Paragraph 1282 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1283. Answering Paragraph 1283 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1284. Answering Paragraph 1284 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1285. Answering Paragraph 1285 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1286. Answering Paragraph 1286 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1287. Answering Paragraph 1287 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1288. Answering Paragraph 1288 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1289. Answering Paragraph 1289 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1289 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1290. Answering Paragraph 1290 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1291. Answering Paragraph 1291 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1292. Answering Paragraph 1292 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1293. Answering Paragraph 1293 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1294. Answering Paragraph 1294 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1295. Answering Paragraph 1295 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1296. Answering Paragraph 1296 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1297. Answering Paragraph 1297 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1298. Answering Paragraph 1298 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1299. Answering Paragraph 1299 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1300. Answering Paragraph 1300 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1301. Answering Paragraph 1301 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1302. Answering Paragraph 1302 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1303. Answering Paragraph 1303 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1304. Answering Paragraph 1304 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1305. Answering Paragraph 1305 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1306. Answering Paragraph 1306 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1307. Answering Paragraph 1307 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1308. Answering Paragraph 1308 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1309. Answering Paragraph 1309 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1310. Answering Paragraph 1310 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1311. Answering Paragraph 1311 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1312. Answering Paragraph 1312 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Shawn Patterson – Fireman/Oiler**

1313. Answering Paragraph 1313 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1314. Answering Paragraph 1314 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1315. Answering Paragraph 1315 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1316. Answering Paragraph 1316 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1317. Answering Paragraph 1317 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1318. Answering Paragraph 1318 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1319. Answering Paragraph 1319 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1320. Answering Paragraph 1320 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1321. Answering Paragraph 1321 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1322. Answering Paragraph 1322 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1323. Answering Paragraph 1323 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1324. Answering Paragraph 1324 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1324 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1325. Answering Paragraph 1325 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1326. Answering Paragraph 1326 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1327. Answering Paragraph 1327 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1328. Answering Paragraph 1328 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1329. Answering Paragraph 1329 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1330. Answering Paragraph 1330 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1331. Answering Paragraph 1331 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1332. Answering Paragraph 1332 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1333. Answering Paragraph 1333 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1334. Answering Paragraph 1334 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1335. Answering Paragraph 1335 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1336. Answering Paragraph 1336 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1337. Answering Paragraph 1337 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1338. Answering Paragraph 1338 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1339. Answering Paragraph 1339 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1340. Answering Paragraph 1340 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1341. Answering Paragraph 1341 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1342. Answering Paragraph 1342 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1343. Answering Paragraph 1343 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1344. Answering Paragraph 1344 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1345. Answering Paragraph 1345 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1346. Answering Paragraph 1346 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1347. Answering Paragraph 1347 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Matthew Woods – Machine Operator**

1348. Answering Paragraph 1348 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1349. Answering Paragraph 1349 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1350. Answering Paragraph 1350 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1351. Answering Paragraph 1351 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1352. Answering Paragraph 1352 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1353. Answering Paragraph 1353 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1354. Answering Paragraph 1354 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1355. Answering Paragraph 1355 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1356. Answering Paragraph 1356 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1357. Answering Paragraph 1357 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1358. Answering Paragraph 1358 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1359. Answering Paragraph 1359 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1360. Answering Paragraph 1360 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1361. Answering Paragraph 1361 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1362. Answering Paragraph 1362 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1363. Answering Paragraph 1363 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1364. Answering Paragraph 1364 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1365. Answering Paragraph 1365 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1366. Answering Paragraph 1366 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1367. Answering Paragraph 1367 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1367 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1368. Answering Paragraph 1368 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1369. Answering Paragraph 1369 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1370. Answering Paragraph 1370 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1371. Answering Paragraph 1371 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1372. Answering Paragraph 1372 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1373. Answering Paragraph 1372 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1374. Answering Paragraph 1374 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1375. Answering Paragraph 1375 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1376. Answering Paragraph 1376 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1377. Answering Paragraph 1377 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1378. Answering Paragraph 1378 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1379. Answering Paragraph 1379 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1380. Answering Paragraph 1380 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1381. Answering Paragraph 1381 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1382. Answering Paragraph 1382 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1383. Answering Paragraph 1383 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1384. Answering Paragraph 1384 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1385. Answering Paragraph 1385 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1386. Answering Paragraph 1386 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1387. Answering Paragraph 1387 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1388. Answering Paragraph 48 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1389. Answering Paragraph 1389 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1390. Answering Paragraph 1390 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1391. Answering Paragraph 1391 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**John Carpenter - Machinist**

1392. Answering Paragraph 1392 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1393. Answering Paragraph 1393 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1394. Answering Paragraph 1394 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1395. Answering Paragraph 1395 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1396. Answering Paragraph 1396 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1397. Answering Paragraph 1397 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1398. Answering Paragraph 1398 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1399. Answering Paragraph 1399 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1400. Answering Paragraph 1400 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1401. Answering Paragraph 1401 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1402. Answering Paragraph 1402 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1403. Answering Paragraph 1403 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1404. Answering Paragraph 1404 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1405. Answering Paragraph 1405 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1405 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1406. Answering Paragraph 1406 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1407. Answering Paragraph 1407 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1408. Answering Paragraph 1408 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1409. Answering Paragraph 1409 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1410. Answering Paragraph 1410 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1411. Answering Paragraph 1411 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1412. Answering Paragraph 1412 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1413. Answering Paragraph 1413 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1414. Answering Paragraph 1414 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1415. Answering Paragraph 1415 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1416. Answering Paragraph 1416 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1417. Answering Paragraph 1417 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1418. Answering Paragraph 1418 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1419. Answering Paragraph 1419 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1420. Answering Paragraph 1420 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1421. Answering Paragraph 1421 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1422. Answering Paragraph 1422 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1423. Answering Paragraph 1423 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1424. Answering Paragraph 1424 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1425. Answering Paragraph 1425 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Quincy Christian – Machinist**

1426. Answering Paragraph 1426 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1427. Answering Paragraph 1427 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1428. Answering Paragraph 1428 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1429. Answering Paragraph 1429 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1430. Answering Paragraph 1430 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1431. Answering Paragraph 1431 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1432. Answering Paragraph 1432 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1433. Answering Paragraph 1433 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1434. Answering Paragraph 1434 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1435. Answering Paragraph 1435 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1436. Answering Paragraph 1436 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1437. Answering Paragraph 1437 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1437 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1438. Answering Paragraph 1438 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1439. Answering Paragraph 1439 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1440. Answering Paragraph 1440 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1441. Answering Paragraph 1441 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1442. Answering Paragraph 1442 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1443. Answering Paragraph 1443 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1444. Answering Paragraph 1444 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1445. Answering Paragraph 1445 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1446. Answering Paragraph 1446 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1447. Answering Paragraph 1447 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1448. Answering Paragraph 1448 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1449. Answering Paragraph 1449 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1450. Answering Paragraph 1450 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1451. Answering Paragraph 1451 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1452. Answering Paragraph 1452 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1453. Answering Paragraph 1453 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1454. Answering Paragraph 1454 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1455. Answering Paragraph 1455 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1456. Answering Paragraph 1456 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1457. Answering Paragraph 1457 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1458. Answering Paragraph 1458 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1459. Answering Paragraph 1459 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1460. Answering Paragraph 1460 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Gregory Hamm – Machinist**

1461. Answering Paragraph 1461 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1462. Answering Paragraph 1462 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1463. Answering Paragraph 1463 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1464. Answering Paragraph 1464 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1465. Answering Paragraph 1465 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1466. Answering Paragraph 1466 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1467. Answering Paragraph 1467 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1468. Answering Paragraph 1468 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1469. Answering Paragraph 1469 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1470. Answering Paragraph 1470 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1471. Answering Paragraph 1471 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1472. Answering Paragraph 1472 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1472 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1473. Answering Paragraph 1473 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1474. Answering Paragraph 1474 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1475. Answering Paragraph 1475 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1476. Answering Paragraph 1476 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1477. Answering Paragraph 1477 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1478. Answering Paragraph 1478 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1479. Answering Paragraph 1479 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1480. Answering Paragraph 1480 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1481. Answering Paragraph 1481 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1482. Answering Paragraph 1482 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1483. Answering Paragraph 1483 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1484. Answering Paragraph 1484 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1485. Answering Paragraph 1485 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1486. Answering Paragraph 1486 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1487. Answering Paragraph 1487 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1488. Answering Paragraph 1488 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1489. Answering Paragraph 1489 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1490. Answering Paragraph 1490 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1491. Answering Paragraph 1491 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1492. Answering Paragraph 1492 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1493. Answering Paragraph 1493 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1494. Answering Paragraph 1494 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1495. Answering Paragraph 1495 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Ethan Mullins – Machinist**

1496. Answering Paragraph 1496 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1497. Answering Paragraph 1497 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1498. Answering Paragraph 1498 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1499. Answering Paragraph 1499 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1500. Answering Paragraph 1500 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1501. Answering Paragraph 1501 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1502. Answering Paragraph 1502 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1503. Answering Paragraph 1503 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1504. Answering Paragraph 1504 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1505. Answering Paragraph 1505 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1506. Answering Paragraph 1506 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1507. Answering Paragraph 1507 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1507 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1508. Answering Paragraph 1508 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1509. Answering Paragraph 1509 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1510. Answering Paragraph 1510 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1511. Answering Paragraph 1511 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1512. Answering Paragraph 1512 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1513. Answering Paragraph 1513 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1514. Answering Paragraph 1514 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1515. Answering Paragraph 1515 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1516. Answering Paragraph 1516 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1517. Answering Paragraph 1517 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1518. Answering Paragraph 1518 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1519. Answering Paragraph 1519 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1520. Answering Paragraph 1520 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1521. Answering Paragraph 1521 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1522. Answering Paragraph 1522 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1523. Answering Paragraph 1523 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1524. Answering Paragraph 1524 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1525. Answering Paragraph 1525 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1526. Answering Paragraph 1526 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1527. Answering Paragraph 1527 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Michael Owens-Machinist**

1528. Answering Paragraph 1528 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1529. Answering Paragraph 1529 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1530. Answering Paragraph 1530 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1531. Answering Paragraph 1531 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1532. Answering Paragraph 1532 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1533. Answering Paragraph 1533 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1534. Answering Paragraph 1534 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1535. Answering Paragraph 1535 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1536. Answering Paragraph 1536 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1537. Answering Paragraph 1537 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1538. Answering Paragraph 1538 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1539. Answering Paragraph 1539 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1539 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1540. Answering Paragraph 1540 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1541. Answering Paragraph 1541 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1542. Answering Paragraph 1542 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1543. Answering Paragraph 1543 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1544. Answering Paragraph 1544 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1545. Answering Paragraph 1545 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1546. Answering Paragraph 1546 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1547. Answering Paragraph 1547 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1548. Answering Paragraph 1548 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1549. Answering Paragraph 1549 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1550. Answering Paragraph 1550 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1551. Answering Paragraph 1551 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1552. Answering Paragraph 1552 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1553. Answering Paragraph 1553 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1554. Answering Paragraph 1554 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1555. Answering Paragraph 1555 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1556. Answering Paragraph 1556 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1557. Answering Paragraph 1557 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1558. Answering Paragraph 1558 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1559. Answering Paragraph 1559 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1560. Answering Paragraph 1560 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1561. Answering Paragraph 1561 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1562. Answering Paragraph 1562 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Jonathan Rowe – Machinist**

1563. Answering Paragraph 1563 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1564. Answering Paragraph 1564 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1565. Answering Paragraph 1565 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1566. Answering Paragraph 1566 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1567. Answering Paragraph 1567 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1568. Answering Paragraph 1568 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1569. Answering Paragraph 1569 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1570. Answering Paragraph 1570 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1571. Answering Paragraph 1571 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1572. Answering Paragraph 1572 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1573. Answering Paragraph 1573 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1573 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1574. Answering Paragraph 1574 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1575. Answering Paragraph 1575 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1576. Answering Paragraph 1576 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1577. Answering Paragraph 1577 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1578. Answering Paragraph 1578 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1579. Answering Paragraph 1579 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1580. Answering Paragraph 1580 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1581. Answering Paragraph 1581 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1582. Answering Paragraph 1582 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1583. Answering Paragraph 1583 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1584. Answering Paragraph 1584 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1585. Answering Paragraph 1585 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1586. Answering Paragraph 1586 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1587. Answering Paragraph 1587 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1588. Answering Paragraph 1588 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1589. Answering Paragraph 1589 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1590. Answering Paragraph 1590 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1591. Answering Paragraph 1591 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1592. Answering Paragraph 1592 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1593. Answering Paragraph 1593 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1594. Answering Paragraph 1594 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1595. Answering Paragraph 1595 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1596. Answering Paragraph 1596 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Danny Stewart – Machinist**

1597. Answering Paragraph 1597 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1598. Answering Paragraph 1598 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1599. Answering Paragraph 1599 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1600. Answering Paragraph 1600 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1601. Answering Paragraph 1601 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1602. Answering Paragraph 1602 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1603. Answering Paragraph 1603 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1604. Answering Paragraph 1604 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1605. Answering Paragraph 1605 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1606. Answering Paragraph 1606 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1607. Answering Paragraph 1607 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1608. Answering Paragraph 1608 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1608 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1609. Answering Paragraph 1609 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1610. Answering Paragraph 1610 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1611. Answering Paragraph 1611 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1612. Answering Paragraph 1612 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1613. Answering Paragraph 1613 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1614. Answering Paragraph 1614 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1615. Answering Paragraph 1615 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1616. Answering Paragraph 1616 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1617. Answering Paragraph 1617 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1618. Answering Paragraph 1618 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1619. Answering Paragraph 1619 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1620. Answering Paragraph 1620 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1621. Answering Paragraph 1621 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1622. Answering Paragraph 1622 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1623. Answering Paragraph 1623 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1624. Answering Paragraph 1624 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1625. Answering Paragraph 1625 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1626. Answering Paragraph 1626 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1627. Answering Paragraph 1627 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1628. Answering Paragraph 1628 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1629. Answering Paragraph 1629 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1630. Answering Paragraph 1630 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Lloyd Williams – Machinist**

1631. Answering Paragraph 1631 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1632. Answering Paragraph 1632 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1633. Answering Paragraph 1633 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1634. Answering Paragraph 1634 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1635. Answering Paragraph 1635 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1636. Answering Paragraph 1636 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1637. Answering Paragraph 1637 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1638. Answering Paragraph 1638 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1639. Answering Paragraph 1639 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1640. Answering Paragraph 1640 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1641. Answering Paragraph 1641 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1642. Answering Paragraph 1642 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1642 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1643. Answering Paragraph 1643 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1644. Answering Paragraph 1644 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1645. Answering Paragraph 1645 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowle46dge regarding the allegations, denies the same and demands strict proof thereof.

1646. Answering Paragraph 1646 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1647. Answering Paragraph 1647 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1648. Answering Paragraph 1648 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1649. Answering Paragraph 1649 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1650. Answering Paragraph 1650 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1651. Answering Paragraph 1651 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1652. Answering Paragraph 1652 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1653. Answering Paragraph 1653 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1654. Answering Paragraph 1654 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1655. Answering Paragraph 1655 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1656. Answering Paragraph 1656 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1657. Answering Paragraph 1657 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1658. Answering Paragraph 1658 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1659. Answering Paragraph 1659 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1660. Answering Paragraph 1660 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1661. Answering Paragraph 1661 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1662. Answering Paragraph 1662 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1663. Answering Paragraph 1663 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1664. Answering Paragraph 1664 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**David Manis – Painter**

1665. Answering Paragraph 1665 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1666. Answering Paragraph 1666 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1667. Answering Paragraph 1667 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1668. Answering Paragraph 1668 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1669. Answering Paragraph 1669 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1670. Answering Paragraph 1670 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1671. Answering Paragraph 1671 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1672. Answering Paragraph 1672 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1673. Answering Paragraph 1673 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1674. Answering Paragraph 1674 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1675. Answering Paragraph 1675 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to

which no response is required. Otherwise, the allegations of Paragraph 1675 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1676. Answering Paragraph 1676 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1677. Answering Paragraph 1677 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1678. Answering Paragraph 1678 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1679. Answering Paragraph 1679 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1680. Answering Paragraph 1680 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1681. Answering Paragraph 1681 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1682. Answering Paragraph 1682 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1683. Answering Paragraph 1683 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1684. Answering Paragraph 1684 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1685. Answering Paragraph 1685 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1686. Answering Paragraph 1686 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1687. Answering Paragraph 1687 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1688. Answering Paragraph 1688 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1689. Answering Paragraph 1689 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1690. Answering Paragraph 1690 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1691. Answering Paragraph 1691 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1692. Answering Paragraph 1692 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1693. Answering Paragraph 1693 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1694. Answering Paragraph 1694 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1695. Answering Paragraph 1695 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1696. Answering Paragraph 1696 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Joshua Ferguson – Sheet Metal Worker**

1697. Answering Paragraph 1697 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1698. Answering Paragraph 1698 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1699. Answering Paragraph 1699 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1700. Answering Paragraph 1700 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1701. Answering Paragraph 1701 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1702. Answering Paragraph 1702 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1703. Answering Paragraph 1703 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1704. Answering Paragraph 1704 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1705. Answering Paragraph 1705 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1706. Answering Paragraph 1706 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1707. Answering Paragraph 1707 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1707 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1708. Answering Paragraph 1708 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1709. Answering Paragraph 1709 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1710. Answering Paragraph 1710 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1711. Answering Paragraph 1711 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1712. Answering Paragraph 1712 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1713. Answering Paragraph 1713 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1714. Answering Paragraph 1714 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1715. Answering Paragraph 1715 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1716. Answering Paragraph 1716 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1717. Answering Paragraph 1717 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1718. Answering Paragraph 1718 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1719. Answering Paragraph 1719 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1720. Answering Paragraph 1720 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1721. Answering Paragraph 1721 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1722. Answering Paragraph 1722 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1723. Answering Paragraph 1723 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1724. Answering Paragraph 1724 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1725. Answering Paragraph 1725 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1726. Answering Paragraph 1726 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1727. Answering Paragraph 1727 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1728. Answering Paragraph 1728 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Eric Speaks – Sheet Metal Worker**

1729. Answering Paragraph 1729 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1730. Answering Paragraph 1730 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1731. Answering Paragraph 1731 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1732. Answering Paragraph 732 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1733. Answering Paragraph 1733 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1734. Answering Paragraph 1734 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1735. Answering Paragraph 1735 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1736. Answering Paragraph 1736 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1737. Answering Paragraph 1737 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1738. Answering Paragraph 1738 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1739. Answering Paragraph 1739 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1740. Answering Paragraph 1740 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1740 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1741. Answering Paragraph 1741 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1742. Answering Paragraph 1742 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1743. Answering Paragraph 1743 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1744. Answering Paragraph 1744 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1745. Answering Paragraph 1745 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1746. Answering Paragraph 1746 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1747. Answering Paragraph 1747 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1748. Answering Paragraph 1748 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1749. Answering Paragraph 1749 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1750. Answering Paragraph 1750 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1751. Answering Paragraph 1751 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1752. Answering Paragraph 1752 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1753. Answering Paragraph 1753 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1754. Answering Paragraph 1754 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1755. Answering Paragraph 1755 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1756. Answering Paragraph 1756 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1757. Answering Paragraph 1757 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1758. Answering Paragraph 1758 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1759. Answering Paragraph 1759 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1760. Answering Paragraph 1760 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1761. Answering Paragraph 1761 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1762. Answering Paragraph 1762 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1763. Answering Paragraph 1763 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Donald Stephens – Sheet Metal Worker**

1764. Answering Paragraph 1764 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1765. Answering Paragraph 1765 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1766. Answering Paragraph 1766 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1767. Answering Paragraph 1767 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1768. Answering Paragraph 1768 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1769. Answering Paragraph 1769 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1770. Answering Paragraph 1770 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1771. Answering Paragraph 1771 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1772. Answering Paragraph 1772 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1773. Answering Paragraph 1773 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1774. Answering Paragraph 1774 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1775. Answering Paragraph 1775 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1775 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1776. Answering Paragraph 1776 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1777. Answering Paragraph 1777 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1778. Answering Paragraph 1778 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1779. Answering Paragraph 1779 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1780. Answering Paragraph 1780 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1781. Answering Paragraph 1781 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1782. Answering Paragraph 1782 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1783. Answering Paragraph 1783 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1784. Answering Paragraph 1784 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1785. Answering Paragraph 1785 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1786. Answering Paragraph 1786 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1787. Answering Paragraph 1787 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1788. Answering Paragraph 1788 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1789. Answering Paragraph 1789 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1790. Answering Paragraph 1790 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1791. Answering Paragraph 1791 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1792. Answering Paragraph 1792 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1793. Answering Paragraph 1793 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1794. Answering Paragraph 1794 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1795. Answering Paragraph 1795 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1796. Answering Paragraph 1796 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1797. Answering Paragraph 1797 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1798. Answering Paragraph 1798 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Chad Dowdy – Utility Worker**

1799. Answering Paragraph 1799 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1800. Answering Paragraph 1800 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1801. Answering Paragraph 1801 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1802. Answering Paragraph 1802 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1803. Answering Paragraph 1803 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1804. Answering Paragraph 1804 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1805. Answering Paragraph 1805 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1806. Answering Paragraph 1806 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1807. Answering Paragraph 1807 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1808. Answering Paragraph 1808 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1809. Answering Paragraph 1809 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1810. Answering Paragraph 1810 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1810 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1811. Answering Paragraph 1811 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1812. Answering Paragraph 1812 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1813. Answering Paragraph 1813 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1814. Answering Paragraph 1814 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1815. Answering Paragraph 1815 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1816. Answering Paragraph 1816 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1817. Answering Paragraph 1817 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1818. Answering Paragraph 1818 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1819. Answering Paragraph 1819 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1820. Answering Paragraph 1820 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1821. Answering Paragraph 1821 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1822. Answering Paragraph 1822 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1823. Answering Paragraph 1823 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1824. Answering Paragraph 1824 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1825. Answering Paragraph 1825 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1826. Answering Paragraph 1826 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1827. Answering Paragraph 1827 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1828. Answering Paragraph 1828 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1829. Answering Paragraph 1829 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1830. Answering Paragraph 1830 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1831. Answering Paragraph 1831 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1832. Answering Paragraph 1832 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1833. Answering Paragraph 1833 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Chad Dowdy – Utility Worker**

1834. Answering Paragraph 1834 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1835. Answering Paragraph 1835 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1836. Answering Paragraph 1836 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1837. Answering Paragraph 1837 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1838. Answering Paragraph 1838 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1839. Answering Paragraph 1839 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1840. Answering Paragraph 1840 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1841. Answering Paragraph 1841 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1842. Answering Paragraph 1842 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1843. Answering Paragraph 1843 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1844. Answering Paragraph 1844 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1845. Answering Paragraph 1845 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1845 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1846. Answering Paragraph 1846 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1847. Answering Paragraph 1847 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1848. Answering Paragraph 1848 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1849. Answering Paragraph 1849 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1850. Answering Paragraph 1850 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1851. Answering Paragraph 1851 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1852. Answering Paragraph 1852 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1853. Answering Paragraph 1853 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1854. Answering Paragraph 1854 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1855. Answering Paragraph 1855 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1856. Answering Paragraph 1856 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1857. Answering Paragraph 1857 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1858. Answering Paragraph 1858 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1859. Answering Paragraph 1859 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1860. Answering Paragraph 1860 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1861. Answering Paragraph 1861 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1862. Answering Paragraph 1862 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1863. Answering Paragraph 1863 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1864. Answering Paragraph 1864 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1865. Answering Paragraph 1865 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1866. Answering Paragraph 1866 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1867. Answering Paragraph 1867 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1868. Answering Paragraph 1868 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Jerry Flocker – Utility Worker**

1869. Answering Paragraph 1869 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1870. Answering Paragraph 1870 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1871. Answering Paragraph 1871 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1872. Answering Paragraph 1872 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1873. Answering Paragraph 1873 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1874. Answering Paragraph 1874 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1875. Answering Paragraph 1875 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1876. Answering Paragraph 1876 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1877. Answering Paragraph 1877 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1878. Answering Paragraph 1878 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1879. Answering Paragraph 1879 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1879 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1880. Answering Paragraph 1880 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1881. Answering Paragraph 1881 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1882. Answering Paragraph 1882 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1883. Answering Paragraph 1883 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1884. Answering Paragraph 1884 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1885. Answering Paragraph 1885 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1886. Answering Paragraph 1886 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1887. Answering Paragraph 1887 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1888. Answering Paragraph 1888 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1889. Answering Paragraph 1889 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1890. Answering Paragraph 1890 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1891. Answering Paragraph 1891 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1892. Answering Paragraph 1892 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1893. Answering Paragraph 1893 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1894. Answering Paragraph 1894 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1895. Answering Paragraph 1895 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1896. Answering Paragraph 1896 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1897. Answering Paragraph 1897 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1898. Answering Paragraph 1898 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1899. Answering Paragraph 1899 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1900. Answering Paragraph 1900 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Grover Kelley- Utility Worker**

1901. Answering Paragraph 1901 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1902. Answering Paragraph 1902 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1903. Answering Paragraph 1903 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1904. Answering Paragraph 1904 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1905. Answering Paragraph 1905 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1906. Answering Paragraph 1906 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1907. Answering Paragraph 1907 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1908. Answering Paragraph 1908 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1909. Answering Paragraph 1909 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1910. Answering Paragraph 1910 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1911. Answering Paragraph 1911 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1912. Answering Paragraph 1912 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1912 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1913. Answering Paragraph 1913 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1914. Answering Paragraph 1914 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1915. Answering Paragraph 1915 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1916. Answering Paragraph 1916 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1917. Answering Paragraph 1917 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1918. Answering Paragraph 1918 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1919. Answering Paragraph 1919 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1920. Answering Paragraph 1920 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1921. Answering Paragraph 1921 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1922. Answering Paragraph 1922 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1923. Answering Paragraph 1923 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1924. Answering Paragraph 1924 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1925. Answering Paragraph 1925 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1926. Answering Paragraph 1926 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1927. Answering Paragraph 1927 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1928. Answering Paragraph 1928 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1929. Answering Paragraph 1929 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1930. Answering Paragraph 1930 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1931. Answering Paragraph 1931 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1932. Answering Paragraph 1932 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1933. Answering Paragraph 1933 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Clay Stiltner – Utility Worker**

1934. Answering Paragraph 1934 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1935. Answering Paragraph 1935 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1936. Answering Paragraph 1936 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1937. Answering Paragraph 1937 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1938. Answering Paragraph 1938 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1939. Answering Paragraph 1939 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1940. Answering Paragraph 1940 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1941. Answering Paragraph 1941 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1942. Answering Paragraph 1942 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1943. Answering Paragraph 1943 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1944. Answering Paragraph 1944 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1945. Answering Paragraph 1945 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1945 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1946. Answering Paragraph 1946 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1947. Answering Paragraph 1947 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.



1948. Answering Paragraph 1948 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1949. Answering Paragraph 1949 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1950. Answering Paragraph 1950 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1951. Answering Paragraph 1951 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1952. Answering Paragraph 1952 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1953. Answering Paragraph 1953 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1954. Answering Paragraph 1954 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1955. Answering Paragraph 1955 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1956. Answering Paragraph 1956 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1957. Answering Paragraph 1957 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1958. Answering Paragraph 1958 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1959. Answering Paragraph 1959 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1960. Answering Paragraph 1960 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1961. Answering Paragraph 1961 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1962. Answering Paragraph 1962 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1963. Answering Paragraph 1963 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1964. Answering Paragraph 1964 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1965. Answering Paragraph 1965 of the Second Amended Complaint, Defendant CSX Corporation states it is

1966. without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1967. Answering Paragraph 1966 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1968. Answering Paragraph 1968 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**Dennis Hutchinson – Welder**

1969. Answering Paragraph 1969 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1970. Answering Paragraph 1970 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1971. Answering Paragraph 971 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1972. Answering Paragraph 1972 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1973. Answering Paragraph 1973 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1974. Answering Paragraph 1974 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1975. Answering Paragraph 1975 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1976. Answering Paragraph 1976 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1977. Answering Paragraph 1977 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1978. Answering Paragraph 1978 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1979. Answering Paragraph 1979 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1980. Answering Paragraph 1980 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1981. Answering Paragraph 1981 of the Second Amended Complaint, Defendant CSX Corporation states this Paragraph contains legal conclusions and a hypothetical statement to which no response is required. Otherwise, the allegations of Paragraph 1981 of the Second Amended Complaint are without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1982. Answering Paragraph 1982 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1983. Answering Paragraph 1983 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1984. Answering Paragraph 1984 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1985. Answering Paragraph 1985 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1986. Answering Paragraph 1986 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1987. Answering Paragraph 1987 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1988. Answering Paragraph 1988 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1989. Answering Paragraph 1989 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1990. Answering Paragraph 1990 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1991. Answering Paragraph 1991 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1992. Answering Paragraph 1992 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1993. Answering Paragraph 1993 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1994. Answering Paragraph 1994 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1995. Answering Paragraph 1995 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1996. Answering Paragraph 1996 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1997. Answering Paragraph 1997 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1998. Answering Paragraph 1998 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

1999. Answering Paragraph 1999 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

2000. Answering Paragraph 2000 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

2001. Answering Paragraph 2001 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

2002. Answering Paragraph 2002 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

**COUNT I:**

**ERISA Section 510 Retaliation (29 U.S.C. Section 1001 et seq.)**

2003. Answering Paragraph 2003 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding



Paragraphs of the Second Amended Complaint as if fully set forth herein.

2004. Answering Paragraph 2004 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and this Defendant cannot admit or deny the allegations contained therein.

2005. Answering Paragraph 2005 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

## **COUNT II**

### **DEFENDANTS' VIOLATION OF SECTION 504 OF THE REHABILITATION ACT, 29 U.S.C. 794 ET SEQ.: DISABILITY DISCRIMINATION AND MEDICAL INQUIRY**

2006. Answering Paragraph 2006 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding Paragraphs of the Second Amended Complaint as if fully set forth herein.

2007. Answering Paragraph 2007 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2008. Answering Paragraph 2008 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and this Defendant cannot admit or deny the allegations contained therein.

2009. Answering Paragraph 2009 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2010. Answering Paragraph 2010 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

**COUNT III**

**Defendants' Violation of the West Virginia Human Relations Act, Title 5-11-1  
et seq.: Disability Discrimination, Medical Inquiry and Aiding and Abetting**

2011. Answering Paragraph 2011 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding Paragraphs of the Second Amended Complaint as if fully set forth herein.

2012. Answering Paragraph 2012 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and this Defendant cannot admit or deny the allegations contained therein.

2013. Answering Paragraph 2013 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2014. Answering Paragraph 2014 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2015. Answering Paragraph 2015 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

**COUNT IV**

**Family and Medical Leave Act of 1993, 29 U.S.C. 2601 et seq.:  
Denial of Benefits and Interference**

2016. Answering Paragraph 2016 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding Paragraphs of the Second Amended Complaint as if fully set forth herein.

2017. Answering Paragraph 2017 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

2018. Answering Paragraph 2018 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2019. Answering Paragraph 2019 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2020. Answering Paragraph 2020 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2021. Answering Paragraph 2021 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2022. Answering Paragraph 2022 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2023. Answering Paragraph 2023 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

## **COUNT V**

### **Defamation**

2024. Answering Paragraph 2024 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding Paragraphs of the Second Amended Complaint as if fully set forth herein.

2025. Answering Paragraph 2025 of the Second Amended Complaint, including subparts (a)-(c), Defendant CSX Corporation denies the allegations contained therein.

2026. Answering Paragraph 2026 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2027. Answering Paragraph 2027 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2028. Answering Paragraph 2028 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2029. Answering Paragraph 2029 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2030. Answering Paragraph 2030 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2031. Answering Paragraph 2031 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2032. Answering Paragraph 2032 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2033. Answering Paragraph 2033 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2034. Answering Paragraph 2034 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

## **COUNT VI**

### **Invasion of Privacy-Public Disclosure of Private Facts**

2035. Answering Paragraph 2035 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding

Paragraphs of the Second Amended Complaint as if fully set forth herein.

2036. Answering Paragraph 2036 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2037. Answering Paragraph 2037 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2038. Answering Paragraph 2038 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2039. Answering Paragraph 2039 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2040. Answering Paragraph 2040 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2041. Answering Paragraph 2041 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2042. Answering Paragraph 2042 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2043. Answering Paragraph 2043 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

## **COUNT VII**

### **Tortious Interference**

2044. Answering Paragraph 2044 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding Paragraphs of the Second Amended Complaint as if fully set forth herein.

2045. Answering Paragraph 2045 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

2046. Answering Paragraph 2046 of the Second Amended Complaint, Defendant CSX Corporation states it is without knowledge regarding the allegations, denies the same and demands strict proof thereof.

2047. Answering Paragraph 2047 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2048. Answering Paragraph 2048 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2049. Answering Paragraph 2049 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2050. Answering Paragraph 2050 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2051. Answering Paragraph 2051 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

## **COUNT VIII**

### **Intentional Infliction of Emotional Distress**

2052. Answering Paragraph 2052 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding Paragraphs of the Second Amended Complaint as if fully set forth herein.

2053. Answering Paragraph 2053 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2054. Answering Paragraph 2054 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2055. Answering Paragraph 2055 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2056. Answering Paragraph 2056 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2057. Answering Paragraph 2057 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2058. Answering Paragraph 2058 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

## **COUNT IX**

### **Wrongful Discharge**

2059. Answering Paragraph 2059 of the Second Amended Complaint, Defendant CSX Corporation hereby adopts and incorporates by reference its answers to each of the preceding Paragraphs of the Second Amended Complaint as if fully set forth herein.

2060. Answering Paragraph 2060 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and this Defendant cannot admit or deny the allegations contained therein.

2061. Answering Paragraph 2061 of the Second Amended Complaint, Defendant CSX Corporation admits that CSX Transportation, Inc. does business in the State of West Virginia

and employs West Virginia citizens. Defendant, CSX Corporation denies the remainder of the allegations contained therein.

2062. Answering Paragraph 2062 of the Second Amended Complaint, Defendant CSX Corporation states that the allegations appear to represent Plaintiffs' statement of the applicable law, and this Defendant cannot admit or deny the allegations contained therein.

2063. Answering Paragraph 2063 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2064. Answering Paragraph 2064 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2065. Answering Paragraph 2065 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2066. Answering Paragraph 2066 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

2067. Answering Paragraph 2067 of the Second Amended Complaint, Defendant CSX Corporation denies the allegations contained therein.

#### **FIFTH DEFENSE**

Plaintiffs' claim pursuant to ERISA Section 510 Retaliation is barred because Plaintiffs were not dismissed for exercising a right to which he or she was entitled to under the provisions of an employee benefits plan, but instead for violating CSX Operating Rule number 104.2.a, and Code of Ethics Policy.



**SIXTH DEFENSE**

Plaintiffs' claim pursuant to ERISA Section 510 Retaliation is barred because no dismissal was based upon a specific intent to deny benefits.

**SEVENTH DEFENSE**

Plaintiffs' claims pursuant to ERISA Section 510 Retaliation is barred because Plaintiffs have not alleged circumstances which give rise to the inference of discrimination.

**EIGHTH DEFENSE**

Plaintiffs' claim pursuant to Section 504 of the Rehabilitation Act is barred because Plaintiffs were not dismissed or denied benefits because of any alleged disability, but instead because Plaintiffs violated CSX Operating Rule number 104.2.a, and Code of Ethics Policy.

**NINTH DEFENSE**

Plaintiffs' claims pursuant to Section 504 of the Rehabilitation Act is barred in whole or in part because Plaintiffs are not otherwise qualified to perform the essential functions associated with their employment with CSX Corporation

**TENTH DEFENSE**

Plaintiffs' claim pursuant to Section 504 of the Rehabilitation Act is barred in whole or in part because Plaintiffs are not disabled within the meaning of the American with Disabilities Act.

**ELEVENTH DEFENSE**

Plaintiffs' claim pursuant to Section 504 of the Rehabilitation Act is barred in whole or in part because Plaintiffs have not alleged that Plaintiffs underwent entrance exams, or that Defendants disclosed those results. *See* 42 U.S.C. § 12112(d)(3); 29 C.F.R. § 1630.14(b).

**TWELFTH DEFENSE**

Plaintiffs' claim pursuant the Rehabilitation Act is barred because any inquiry into Plaintiffs' medical history was job-related and consistent with business necessity.

**THIRTEENTH DEFENSE**

The disclosure of Plaintiffs' medical history, if any, was made pursuant to the Plaintiffs' respective collective bargaining agreements, and the only documents disclosed were work-related and provided to defendants willfully by the Plaintiffs.

**FOURTEENTH DEFENSE**

Plaintiffs' claim pursuant to the West Virginia Human Rights Act is barred because Plaintiffs were not dismissed because of treatment for a statutory disability; instead, Plaintiffs were dismissed for violating Defendant CSX Transportation, Inc.'s Operating Rules and Code of Conduct.

**FIFTEENTH DEFENSE**

Plaintiffs' claim pursuant to the West Virginia Human Rights Act is barred in whole or in part because Plaintiffs are not disabled within the meaning of the American with Disabilities Act.

**SIXTEENTH DEFENSE**

Plaintiffs' claim pursuant to the West Virginia Human Rights Act is barred because the claim is preempted by ERISA, or otherwise.

**SEVENTEENTH DEFENSE**

Plaintiffs' claim pursuant to the Family Medical Leave Act is barred because Plaintiffs were not dismissed because of a serious health condition, but instead because Plaintiffs violated Defendant CSX Transportation, Inc.'s Operating Rules and Code of Conduct.

**EIGHTEENTH DEFENSE**

Plaintiffs' claim pursuant to the Family Medical Leave Act is barred in whole or in part because Plaintiffs were not eligible employees under the Family Medical Leave Act.

**NINETEENTH DEFENSE**

Plaintiffs' claim pursuant to the Family Medical Leave Act is barred in whole or in part because Plaintiffs were not suffering from a serious health condition that rendered him or her unable to perform the functions of his or her employment position.

**TWENTIETH DEFENSE**

Plaintiffs' claim for defamation is barred because all allegedly defamatory statements, which CSX Corporation denies making, were true, or substantially true, or pure opinion, and thus, cannot be the basis for a defamation action.

**TWENTY-FIRST DEFENSE**

Plaintiffs' claim for defamation is barred on the grounds that any allegedly defamatory statements, which CSX Corporation denies making, were qualifiedly, or absolutely, privileged because they were made in good faith and with an interest to be upheld, were limited in scope, made upon proper occasion in a proper manner and to proper parties only.

**TWENTY-SECOND DEFENSE**

Plaintiffs' claim for defamation is barred on the grounds that any allegedly defamatory statements, which Defendant CSX Corporation denies making, were expressions of opinion.

**TWENTY-THIRD DEFENSE**

Plaintiffs' defamation claim is barred in whole or in part because the allegedly defamatory statements were absolutely or qualifiedly privileged in that they were made in good faith in the course of employment disciplinary hearings on a matter that Defendant CSX Transportation, Inc. had an interest or duty in upholding.

**TWENTY- FOURTH DEFENSE**

Plaintiffs' defamation claims are barred in whole or in part because the allegedly defamatory statements, which CSX Corporation denies making, were based on correct and/or reasonable beliefs that the information affected sufficiently important public interests. The public interests required the communication of the allegedly defamatory matters to persons that were authorized or privileged to take action if the allegedly defamatory matters were true.

**TWENTY-FIFTH DEFENSE**

Plaintiffs' claim for defamation is barred on the grounds that any allegedly defamatory statements, which Defendant CSX Corporation denies making, were not made in bad faith.

**TWENTY-SIXTH DEFENSE**

Plaintiffs' claim for defamation is barred on the grounds that any allegedly defamatory statements, which Defendant CSX Corporation denies making, were statements concerning a legitimate public interest.

**TWENTY-SEVENTH DEFENSE**

Plaintiffs' claim public disclosure of private facts is barred because any factual disclosure was made only to a small group of persons.

**TWENTY-EIGHTH DEFENSE**

Plaintiffs' claim for public disclosure of private facts is barred on the grounds that any alleged disclosure was done in good faith and to proper parties only.

**TWENTY-NINTH DEFENSE**

Plaintiffs' claim for public disclosure of private facts is barred on the grounds that any alleged disclosure did not contain private facts.

**THIRTIETH DEFENSE**

Plaintiffs' claim for public disclosure of private facts is barred in whole or in part because any disclosure of private facts was absolutely or qualifiedly privileged in that they were made in good faith in the course of employment disciplinary hearings on a matter that Defendant CSX Corporation had an interest or duty in upholding.

**THIRTY-FIRST DEFENSE**

Plaintiffs' tortious interference claim is barred on the grounds that any alleged actions of interference were justified or privileged, for the following reasons: the alleged actions were conducted in the legitimate economic interest of Defendant CSX Transportation; the alleged actions were committed as part of Defendant CSX Transportation, Inc.'s responsibility for another's welfare; the alleged actions were committed with an intent to influence another's business policies in which Defendant CSX Transportation, Inc. has an interest; and the alleged information was given as part of honest, truthful requested advice.

**THIRTY-SECOND DEFENSE**

Plaintiffs' tortious interference claim is barred on the grounds that the alleged interference, if any, was not intentional.

**THIRTY-THIRD DEFENSE**

Plaintiffs' tortious interference claim is barred on the grounds that Plaintiffs' alleged business relations with their medical and benefit providers were not harmed.

**THIRTY-FOURTH DEFENSE**

Plaintiffs' tortious interference claim is barred on the grounds that it is preempted by ERISA, or otherwise.

**THIRTY-FIFTH DEFENSE**

Plaintiffs' claim for intentional infliction of emotional distress is barred on the grounds that any alleged conduct was not so atrocious as to exceed the bounds of decency because: the alleged actions were conducted in the legitimate economic interest of Defendant CSX Transportation, Inc.; the alleged actions were committed pursuant to Plaintiffs' respective collective bargaining agreements; and the alleged actions were committed in an effort to uncover fraud against Defendant CSX Transportation. Inc.

**THIRTY-SIXTH DEFENSE**

Plaintiffs' claim for intentional infliction of emotional distress is barred on the grounds that Defendant CSX Corporation did not intend to cause emotional distress.

**THIRTY-SEVENTH DEFENSE**

Plaintiffs' claim for intentional infliction of emotional distress is barred on the grounds that Plaintiffs' Complaint is devoid of factual allegations to support an outrageous manner of termination.

**THIRTY-EIGHTH DEFENSE**

Plaintiffs' claim for wrongful discharge is barred because Defendant CSX Transportation, Inc. had a legitimate business justification for the dismissals.

**THIRTY-NINTH DEFENSE**

Plaintiffs' claim for wrongful discharge is barred because none of the dismissals were motivated by conduct related to public policies cited by Plaintiffs in the Complaint.

**FORTIETH DEFENSE**

Plaintiffs' claim for wrongful discharge is barred because it is preempted by ERISA, the Railway Labor Act, or otherwise.

**FORTY-FIRST DEFENSE**

Plaintiffs' claim for wrongful discharge is barred in whole or in part because Plaintiffs failed to exhaust the grievance process.

**FORTY-SECOND DEFENSE**

If Plaintiffs suffered any damages, which Defendant CSX Corporation denies, those damages were caused by Plaintiffs' own actions and/or negligence.

**FORTY-THIRD DEFENSE**

If Plaintiffs suffered any damages, which Defendant CSX Corporation denies, those damages were caused by the actions and/or inactions of a third party over which Defendant CSX Corporation had no control and for whom Defendant CSX Corporation is not legally responsible.

**FORTY-FOURTH DEFENSE**

Plaintiffs have failed to mitigate their damages as required by law.

**FORTY-FIFTH DEFENSE**

Some or all of Plaintiffs' claims are barred by the applicable statute of limitations.

**FORTY-SIXTH DEFENSE**

Plaintiffs are not entitled to recover any compensatory or punitive damages and any allegations with respect to these damages should be stricken because CSX Corporation did not intentionally engage in any malicious or reckless conduct. Plaintiffs' claim for punitive damages also violates the Fifth, Eighth, and Fourteenth Amendments of the United States Constitution. Alternatively, punitive damages are inappropriate under the facts of this action.

**FORTY-SEVENTH DEFENSE**

Plaintiffs' Complaint, and each cause of action alleged therein, fails to allege specific separate and independent acts in furtherance of a conspiracy.

**FORTY-EIGHTH DEFENSE**

Plaintiffs' Complaint and each cause of action alleged therein, is barred by the doctrines of waiver, laches, unclean hands, and/or estoppel.



**FORTY-NINTH DEFENSE**

Any actions CSX Corporation took in this matter were in good faith and based upon reasonable grounds for believing that those actions were in compliance with the law.

**FIFTIETH DEFENSE**

Any actions CSX Corporation took in this matter were in good faith in an effort to uncover fraud perpetrated by Plaintiffs against CSX Corporation.

**FIFTY-FIRST DEFENSE**

CSX Corporation denies that any impermissible motive played a role in any employment decisions relating to Plaintiff.

**FIFTY-SECOND DEFENSE**

Plaintiffs' claims are barred because any actions CSX Corporation took in this matter were made in good faith pursuant to the Plaintiffs' respective collective bargaining agreements.

**FIFTY-THIRD DEFENSE**

The Plaintiffs' claims are preempted, in whole or in part, by federal law, including but not limited to, the Federal Rail Safety Act, of 1970, 49 U.S.C. § 20101, et seq., the Railway Labor Act, and ERISA.

**FIFTY-FOURTH DEFENSE**

Plaintiffs' claims are barred because they knowingly attempted to defraud CSX Corporation.

**FIFTY-FIFTH DEFENSE**

Because of their intent to defraud CSX Corporation Plaintiffs are barred from reinstatement.

**FIFTY-SIXTH DEFENSE**

Any acts or statements alleged to have been made by CSX Corporation were protected by the intercorporate conspiracy doctrine.

**FIFTY-SEVENTH DEFENSE**

Defendant CSX Corporation reserves the right to assert defenses related to jurisdiction and venue that become necessary.

**FIFTY-EIGHTH DEFENSE**

Defendant CSX Corporation reserves the right to amend this Answer and to add any additional defenses as discovery may warrant.

**WHEREFORE,** Defendant, CSX Corporation, hereby denies any liability for damages and having fully answered the allegations in Plaintiffs' Second Amended Complaint, states that the Plaintiffs are not entitled to the relief prayed for in the Second Amended Complaint, and prays that the Plaintiffs' Second Amended Complaint in this action be dismissed, and that Defendant CSX Corporation be awarded reasonable attorney fees, costs in defending this action, and such other and further relief as this Court may deem just and appropriate.

**CSX CORPORATION**

By /s/Melissa Foster Bird  
Of Counsel

Melissa Foster Bird, Esquire

Megan B. Davis, Esquire

**NELSON MULLINS RILEY & SCARBOROUGH LLP**

949 Third Avenue, Suite 200

Huntington, West Virginia 25719

(304) 526-3503

Counsel for Defendant,

**CSX CORPORATION**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 13<sup>th</sup> day of August, 2019, she has served a copy of the foregoing document upon counsel of record by electronically filing the foregoing “*CSX Corporation’s Answer to Second Amended Complaint*” with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/Melissa Foster Bird